IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

Applicants: Roland E. **VILLACORTA et al.**

Application No.: 10/685,865

Filed: October 15, 2003

For: **SYSTEM AND METHOD FOR MANAGING CREDIT RISK FOR INVESTMENT PORTFOLIOS**

Art Unit: 3691

Examiner: Shrestha, Bijendra K.

Confirmation No.: 5769

Mail Stop Amendment
Commissioner for Patents
P.O. Box 1450
Alexandria, VA 22313-1450

RESPONSE

Dear Commissioner:

In response to the Office Action mailed October 4, 2011, please amend the above-identified application as follows:

Amendments to the Claims begin on page 2 of this paper.

Remarks begin on page 7 of this paper.

CERTIFICATE OF TRANSMISSION

I hereby certify that this paper (along with any paper referred to as being attached or enclosed) is being transmitted via the Office electronic filing system in accordance with 37 C.F.R. § 1.6(a)(4).

Dated: January 4, 2012 Signature: /Christopher J. Capelli/ (Christopher J. Capelli)